

ANGELINA CAMARILLO, et al

v

CITY OF NORTH LAS VEGAS, et al

DEFENDANTS' PETITION FOR REMOVAL
UNDER 28 U.S.C. § 1446(a)

EXHIBIT A

Complaint

Pages 1-21

Electronically Filed

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Steven D. Grierson

CLERK OF THE COURT

DISTRICT COURT CIVIL COVER SHEET

Clark County, Nevada

Case No.

(Assigned by Clerk's Office)

**I. Party Information** (provide both home and mailing addresses if different)

Plaintiff(s) (name/address/phone): Angelina Camarillo, Estate of Felicia Guzman C/o Peter Goldstein	Defendant(s) (name/address/phone): CITY OF NORTH LAS VEGAS; BECKY SALK 2250 Las Vegas Blvd. North North Las Vegas, Nevada 89030
Attorney (name/address/phone): Peter Goldstein, Attorney at law 10161 Park Run Drive Suite 150, Las Vegas, NV 89145 (702) 474-6400	Attorney (name/address/phone):

II. Nature of Controversy (please select the one most applicable filing type below)

Civil Case Filing Types

Real Property	Torts	
Landlord/Tenant <input type="checkbox"/> Unlawful Detainer <input type="checkbox"/> Other Landlord/Tenant Title to Property <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Other Title to Property Other Real Property <input type="checkbox"/> Condemnation/Eminent Domain <input type="checkbox"/> Other Real Property	Negligence <input type="checkbox"/> Auto <input type="checkbox"/> Premises Liability <input type="checkbox"/> Other Negligence Malpractice <input type="checkbox"/> Medical/Dental <input type="checkbox"/> Legal <input type="checkbox"/> Accounting <input type="checkbox"/> Other Malpractice	Other Torts <input type="checkbox"/> Product Liability <input checked="" type="checkbox"/> Intentional Misconduct <input type="checkbox"/> Employment Tort <input type="checkbox"/> Insurance Tort <input type="checkbox"/> Other Tort
Probate	Construction Defect & Contract	Judicial Review/Appeal
Probate (select case type and estate value) <input type="checkbox"/> Summary Administration <input type="checkbox"/> General Administration <input type="checkbox"/> Special Administration <input type="checkbox"/> Set Aside <input type="checkbox"/> Trust/Conservatorship <input type="checkbox"/> Other Probate Estate Value <input type="checkbox"/> Over \$200,000 <input type="checkbox"/> Between \$100,000 and \$200,000 <input type="checkbox"/> Under \$100,000 or Unknown <input type="checkbox"/> Under \$2,500	Construction Defect <input type="checkbox"/> Chapter 40 <input type="checkbox"/> Other Construction Defect Contract Case <input type="checkbox"/> Uniform Commercial Code <input type="checkbox"/> Building and Construction <input type="checkbox"/> Insurance Carrier <input type="checkbox"/> Commercial Instrument <input type="checkbox"/> Collection of Accounts <input type="checkbox"/> Employment Contract <input type="checkbox"/> Other Contract	Judicial Review <input type="checkbox"/> Foreclosure Mediation Case <input type="checkbox"/> Petition to Seal Records <input type="checkbox"/> Mental Competency Nevada State Agency Appeal <input type="checkbox"/> Department of Motor Vehicle <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other Nevada State Agency Appeal Other <input type="checkbox"/> Appeal from Lower Court <input type="checkbox"/> Other Judicial Review/Appeal
Civil Writ	Other Civil Filing	
Civil Writ <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Writ of Mandamus <input type="checkbox"/> Writ of Quo Warrant	Other Civil Filing <input type="checkbox"/> Writ of Prohibition <input type="checkbox"/> Other Civil Writ	
<i>Business Court filings should be filed using the Business Court civil coversheet.</i>		

May 15, 2025

Date

Signature of initiating party or representative

See other side for family-related case filings.

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5 *Attorney for Plaintiffs*
6 *ANGELINA CAMARILLO, Individually*
and as Co-Special Administrator with ROLLY
7 *ENRIQUEZ of estate of FELICIA GUZMAN*

8 **DISTRICT COURT**

9 **CLARK COUNTY, NEVADA**

10
11 ANGELINA CAMARILLO, individually and
as Co-Special Administrator with Rolly
12 ENRIQUEZ of the Estate of Decedent,
FELICIA GUZMAN

13 Plaintiffs,
14 vs.

15 CITY OF NORTH LAS VEGAS; BECKY
SALKOFF; CAITLYN EBERT; and DOES 1-
16 20, inclusive,

17 Defendants.

10 CASE NO.:
DEPT. NO.:

11 **PLAINTIFFS' COMPLAINT AND
DEMAND FOR JURY TRIAL**

12 **Exhibit "A" Order Appointing Special
Administrators**

13 **Exhibit "B" Redacted Death Certificate**

- 14
- 15 **1. Unreasonable Search and Seizure—
Excessive Force in violation of Article 1,
§ 8 (2) & Article 18 of the Nevada
Constitution**
 - 16 **2. Battery (Wrongful Death)**
 - 17 **3. Negligence (Wrongful Death)**
 - 18 **4. Americans with Disability Act Violation**

19
20 Plaintiffs, ANGELINA CAMARILLO, individually, and ROLLY ENRIQUEZ, as Co-
21 Special Administrators of the ESTATE OF FELICIA GUZMAN, by and through their attorneys of
22 record, PETER GOLDSTEIN, ESQ. of PETER GOLDSTEIN LAW CORP, hereby complain and
23 allege against Defendants, and each of them, as follows:

24 **I.**

25 **PARTIES AND JURISDICTION**

26 1. At all relevant times, Decedent FELICIA GUZMAN ("DECEDENT" or
27 "GUZMAN") was an individual residing in North Las Vegas, Nevada.

1 2. DECEDENT is survived by her biological daughter, Plaintiff ANGELINA
2 CAMARILLO (“CAMARILLO”).

3 3. DECEDENT is also survived by her biological mother, Linda Guzman, who resides
4 in Sacramento, California.

5 4. At all times herein relevant, CAMARILLO resided in California.

6 5. CAMARILLO sues in her individual capacity as daughter of DECEDENT and in a
7 representative capacity as Co-Special Administrator of the Estate of Felicia Guzman. See Exhibit
8 “B”, Order Appointing Co-Special Administrators of FELICIA GUZMAN, attached hereto, and
9 incorporated herein by this reference. Plaintiffs seek all damages available under NRS 41.100.
10

11 6. At all times herein relevant, ROLLY ENRIQUEZ (“ENRIQUEZ”) resides in Clark
12 County, Nevada.

13 7. ENRIQUEZ sues in a representative capacity as co-special administrator of
14 DECEDENT’s Estate.

15 8. Plaintiff CAMARILLO seek both survival and wrongful death damages under
16 Nevada state law while Plaintiff ENRIQUEZ is a co-administrator joining CAMARILLO for
17 survival damages under Nevada state law.

18 9. At all times herein mentioned, Defendant CITY OF NORTH LAS VEGAS
19 (hereinafter “CNLV”) is and was at all relevant times mentioned herein, a municipality duly
20 organized and existing under the laws of the State of Nevada. It is a local government unit
21 responsible for the area within its designated boundaries and employs, controls and supervises North
22 Las Vegas Police Department (“NLVPD”).
23

24 10. At all relevant times, NLVPD was the employer of Defendants BECKY SALKOFF
25 (“SALKOFF”), CAITLYN EBERT (“EBERT”) and DOES 1-10, (“DOE OFFICERS”) who were
26 NLVPD Police Officers, and DOES 11 through 20 (“DOE SUPERVISORS”) who were managerial,
27 supervisorial, and policymaking employees of the NLVPD.
28

1 11. SALKOFF, EBERT and DOE OFFICERS are sued in their individual capacity for
2 damages only.

3 12. At all times herein mentioned, CNLV employed, controlled, and operated the
4 NLVPD, its police officers, and are liable for the actions and/or inactions of its police officers and
5 DOES 11-20

6 13. At all relevant times, Defendants SALKOFF, EBERT and DOES 1-10 were duly
7 authorized employees and agents of NLVPD, who were acting under color of law within the course
8 and scope of their respective duties as police officers and with the complete authority and ratification
9 of their principal, Defendant CNLV.

10 14. At all relevant times, Defendants SALKOFF, EBERT and DOES 1-20 were duly
11 appointed officers and/or employees or agents of NLVPD, subject to oversight and supervision by
12 NLVPD's elected and non-elected officials.

13 15. In doing the acts and failing and omitting to act as hereinafter described Defendants
14 SALKOFF and EBERT and DOES 1-20 were acting with the implied and actual permission and
15 consent of CNLV.

16 16. At all times mentioned herein, every CNLV defendant was the agent of each and
17 every other CNLV defendant and had the legal duty to oversee and supervise the hiring, conduct,
18 and employment of each and every CNLV Defendant.

19 17. The true names of Defendants DOES 1 through 20, inclusive, are unknown to
20 Plaintiffs, who therefore sue these defendants by such fictitious names.

21 18. DOES 1 and 2 are designated by fictitious names as they were present at the scene yet
22 failed to do anything and were therefore integral participants and also failed to intervene.

23 19. The Plaintiffs will seek leave to amend this complaint to show the true names and
24 capacities of these defendants when they have been ascertained.

1 20. Plaintiff is informed and believes and thereon alleges that, at all times herein relevant,
2 each of the Defendants, was a principal, master, employer, co-conspirator, joint venturer and
3 successor in interest of every other defendant, and every defendant was acting within the scope of
4 said agency authority, employment, conspiracy, joint venture and succession of interest.

5 21. Each of the fictitiously named defendants DOES 1 though 20 is responsible in some
6 manner for the conduct and liabilities alleged herein.
7

II.

STATEMENT OF FACTS

9 22. Upon information and belief, on May 16, 2023, at approximately 5:00 pm, NLVPD
10 was contacted via the 911 system about GUZMAN. She was reported to have charged at her
11 roommate with a knife in a group home they both resided in at 1414 Basin Brook Dr., North Las
12 Vegas, Nevada.
13

14 23. Upon information and belief, GUZMAN had records of previous arrests and Legal
15 2000's.
16

17 24. Despite knowledge of her mental health crisis, and possession of a knife, the dispatch
18 officer(s) (i.e., DOES 11-20) designated the call as a 433 (Stolen property), rather than a 413A
(Person with a knife).
19

20 25. Upon information and belief, the dispatch call went out at 5:09 pm and SALKOFF
21 and EBERT assigned themselves to the call.
22

23 26. Upon information and belief, SALKOFF arrived first at around 5:12 pm and EBERT
24 shortly followed.
25

26 27. SALKOFF and EBERT then made contact with a man, later discovered to be Neil
27 McGimpsey ("Neil"), outside the residence at 1414 Basin Brook Dr. North Las Vegas. Neil was
28 purportedly the owner of the residence, but it is unclear if he was in the house when the assault
occurred.
29

30 28. Plaintiffs allege based on information belief that SALKOFF and EBERT had made
31 contact with the victim of the alleged stabbing as well as another witness who was inside the house
32
33

1 prior to their contact with Neil. Plaintiffs allege that SALKOFF and EBERT were aware of the
2 allegations against Guzman and had been briefed by those witnesses about the violence that she
3 allegedly committed.

4 29. SALKOFF and EBERT lackadaisically spoke to Neil and interviewed him in front of
5 the house where GUZMAN could see them, even though SALKOFF and EBERT had the
6 information that GUZMAN was inside and armed with a knife. SALKOFF and EBERT did not
7 direct Neil to move away from the house near a patrol car to keep him safe from GUZMAN, who
8 they were informed had previously attacked a resident with a kitchen knife.

9 30. SALKOFF and EBERT showed absolutely no regard for the safety of the Neil or the
10 use proper police tactics from the beginning of their arrival to their fatal shooting of GUZMAN.

11 31. SALKOFF and EBERT were aware of the dispatch call involving a serious event
12 involving a person that was violent with a weapon. They failed to immediately address and utilize
13 tactics to keep the public safe from danger. SALKOFF and EBERT failed to relocate Neil away
14 from the house to interview him to prevent him from being caught in crossfire (which he was) or to
15 facilitate their apprehending Guzman. Properly trained police officers would not have interviewed a
16 witness in front of a residence in which they were aware that there was a person who allegedly
17 committed a violent crime with a weapon and was still inside the house; SALKOFF and EBERT did
18 not exhibit any concern of the gravity of the situation, nor did they communicate with each other and
19 devise a tactical plan.

20 32. Eventually, a clearly agitated GUZMAN came out of the house with a knife in hand,
21 after seeing the officers and Neil talking in front of the house. GUZMAN was clearly mentally
22 distressed and not in a rational mindset.

23 33. SALKOFF and EBERT responded to GUZMAN by asking her to sit down in a chair
24 and to put down the knife while simultaneously drawing their weapons, without regard for the
25 people around or for less lethal force options.

26 34. GUZMAN was obviously having a mental crisis, as she was diagnosed with multiple
27 mental health disorders and was unable to hear and/or comprehend commands based on the limited
28 bodycam publicly available.

1 35. SALKOFF and EBERT repeatedly yelled at GUZMAN with their weapons drawn,
2 while DECEDENT was obviously in crisis, paranoid, and clearly non-compliant.

3 36. Upon information and belief, GUZMAN walked towards SALKOFF and EBERT,
4 who were able to back up and use patrol cars as cover. These officers had time, cover, and distance
5 from GUZMAN before they improperly fired out of shear desperation, as the result of their having
6 no tactics, no planning, and no communication.

7 37. SALKOFF and EBERT failed to articulate any form of warning that they would shoot
8 their weapons if GUZMAN did not comply with their orders. Instead, they just shot GUZMAN
9 multiple times.

10 38. SALKOFF and EBERT shot GUZMAN with six (6) lethal rounds, and she was struck
11 by four (4). The shots were fatal, killing GUZMAN.

12 39. SALKOFF's and EBERT's use of lethal force - which killed GUZMAN - was
13 unnecessary, unreasonable, and unlawful.

14 40. Upon information and belief, SALKOFF and EBERT knew or should have known
15 that GUZMAN was armed with a knife, so it was improper and deficient that SALKOFF and
16 EBERT were surprised or taken aback when they saw GUZMAN with a knife in hand.

17 41. Upon information and belief, SALKOFF and EBERT knew or should have known
18 that GUZMAN had mental health issues by virtue of the previous legal 2000s, by the dispatch and
19 by Neil and other witnesses.

20 42. SALKOFF and EBERT did not preplan their approach even after they received
21 information that GUZMAN had a knife and allegedly injured someone.

22 43. SALKOFF and EBERT made no effort to peacefully resolve GUZMAN's mental
23 health crisis by first establishing a rapport with her leading to them repeatedly screaming at her.

24 44. SALKOFF and EBERT did not attempt to de-escalate the situation even if it was
25 apparent that GUZMAN was having a mental crisis.

26 45. SALKOFF and EBERT did not attempt to deploy any less lethal options despite
27 having the means to do so. They were equipped with many tools in their duty belts and in their

1 vehicles that they could have utilized, such as tasers and less lethal shotguns. Also, they could have
2 called for back-up or a K9 unit to be deployed.

3 46. Upon information and belief, SALKOFF and EBERT did not attempt to request a
4 Crisis Intervention Team.

5 47. SALKOFF and EBERT knew or should have known that GUZMAN could not hear,
6 comprehend or comply their commands and was not responsive, because among other things, she
7 was suffering from a mental health crisis.

8 48. Prior to and upon their arrival, before making contact with GUZMAN, SALKOFF
9 and EBERT did not preplan or communicate a tactical plan on how to approach GUZMAN, they did
10 not discuss the use of less lethal options or provide sufficient time to coordinate de-escalation, as
11 well as failing to establish a rapport with her (these are basic police tactics that they seemed
12 oblivious about).

13 49. SALKOFF and EBERT failed to establish or develop rapport with GUZMAN in order
14 to try to de-escalate the situation. Instead, they completely ignored her while she was in the house by
15 talking casually and lackadaisically with Neil in the front yard where GUZMAN could see them.

16 50. As GUZMAN exited the house right before she was shot, GUZMAN did not pose a
17 threat to any member of the public. GUZMAN was not in a position where she was approaching
18 another residence or other persons who might be potentially exposed to danger. There was no risk
19 that GUZMAN was a threat to anyone other than potentially SALKOFF and EBERT whose
20 approach was not within policy.

21 51. SALKOFF and EBERT should never have positioned themselves within striking
22 distance of the subject coming out of the house armed with a knife. They failed to create and
23 maintain sufficient distance. SALKOFF was specifically positioned next to the garage door which
24 was especially concerning given that if she fired then Neil could have been struck by crossfire.

25 52. Upon information and belief, SALKOFF and EBERT did not attempt to gather
26 additional resources, or use less lethal weapons, such as a 40-mm ballistic foam launcher, less lethal
27 shotguns, tasers, K-9 team, crisis negotiators, or other tools.

1 53. This is especially concerning because NLVPD has had numerous instances of
2 shooting persons in crisis who are holding sharp edged objects and failing to develop tactical plans
3 to assess and attempt to diffuse the situations without the use of lethal force.

4 54. GUZMAN proceeded to walk toward the SALKOFF and EBERT in apparent
5 distress and clearly unable to hear, comprehend or comply with their commands.

6 55. Upon information and belief, SALKOFF and EBERT shot and killed GUZMAN
7 because of their deficient acts and omissions, including (without limitation) that they failed to
8 employ proper police tactics, and they failed to plan their course of action in light of the possibility
9 that GUZMAN may come out of the home with the weapon that they knew she was armed with.

10 56. At the time of the shooting, SALKOFF was forty years old and was working as a
11 sergeant for NLVPD.

12 57. At the time of the shooting, EBERT was twenty-nine years old and was working as an
13 officer for NLVPD.

14 58. For all the reasons mentioned above and all the failures to follow policy, SALKOFF
15 and EBERT violated Article 1, § 18 of the Nevada Constitution guaranteeing the right to be free
16 from unreasonable searches and seizures, which mirror the protections of the Fourth Amendment of
17 the U.S. Constitution.

18 59. Upon information and belief, SALKOFF and EBERT failed to immediately render
19 medical assistance, even though they are equipped with tourniquets, they failed to use them to stop
20 the bleeding.

21 60. GUZMAN sustained multiple gunshot wounds which were the cause of her death as
22 evidenced in her death certificate. Some of her gunshot wounds were to the back of her body which
23 was fired after she was already disabled and in a defensive posture. Her death was ruled a homicide.

24 61. SALKOFF and EBERT's approach, implementation of preplanning (or lack thereof),
25 failure to de-escalate, preclusion and deficient threat assessment were not within Departmental
26 training, tactics, and policy. Among other things, SALKOFF and EBERT failed to communicate and
27 coordinate a response, slow the momentum, and gather resources.

1 62. SALKOFF and EBERT were aware of and yet failed to abide by fundamental
2 principles of officer-citizen contacts – including de-escalation, slowing the momentum, utilizing
3 cover, and making use of the availability of other officers and resources. This is especially
4 improper, given that there were at least one or two other NLVPD officers present who failed to do
5 anything (DOES 1 and 2).

6 63. SALKOFF and EBERT’s lack of adequate preplanning was not in accordance with
7 tactics, training and policy. SALKOFF’s and EBERT’s supposed preplanning was that they would
8 find the subject and expect the subject to comply with their commands. Defendants did not
9 coordinate a response in the event that GUZMAN did not comply. They did not follow their training
10 by planning or gathering the use of less lethal options we were both equipped with tasers.

11 64. SALKOFF and EBERT arrived at around 5:12PM at the residence and the fatal
12 shooting occurred at 5:23 PM. They were there approximately 11 minutes during which they never
13 communicated, developed a tactical plan, or established a rapport with GUZMAN.

14 65. SALKOFF and EBERT failed to move Neil into safety, when they were aware that
15 GUZMAN was inside the house with a knife and was mentally unstable. SALKOFF and EBERT
16 risked the life of Neil by allowing him to stay in close proximity with GUZMAN who had a knife.
17 By unnecessarily chatting with Neil in front of the house where GUZMAN could see them,
18 SALKOFF and EBERT likely caused GUZMAN to become more aggravated and agitated.

19 66. There was no urgency because GUZMAN was alone in the house and she was not at
20 risk of hurting anyone inside; i.e., there was no need for SALKOFF and EBERT to rush to take
21 immediate action without proper preplanning, communication, and deliberation. SALKOFF and
22 EBERT knew that GUZMAN was in possession of a knife and that she had mental health issues; yet
23 SALKOFF and EBERT failed to slow the momentum or de-escalate the situation. Instead, they
24 aggravated it by poor planning, reckless disregard for the welfare of GUZMAN and Neil. They also
25 failed to use DOES 1 and 2, who failed on their own.

26 67. Use of Force training provides for the use of cover, creation of time, creation of
27 distance, to tactically reposition when necessary (among other things) in order to diffuse a tense
28 police encounter. Instead, SALKOFF and EBERT drew their guns and shot at GUZMAN.

SALKOFF and EBERT failed to take action to de-escalate the situation or slow the momentum – other than twice shouting "drop the knife" just before firing. (Shouting "drop the knife" does not constitute a warning as to what would occur if GUZMAN did not drop the knife.) Meanwhile DOES 1 and 2 did nothing.

68. Under Use of Force policies, the elements necessary to justify the use of deadly force include ability, opportunity, imminent jeopardy, and preclusion. Two core POST guidelines, regarding use of force principles, are de-escalation and slowing the momentum. SALKOFF and EBERT did not employ reasonable steps to de-escalate or slow the momentum. When they arrived at the scene, they were unorganized and used a hazardous approach to a high-risk encounter.

69. In addition to SALKOFF and EBERT, the two other officers present during the incident, now designated as DOES 1 and 2 failed to participate in any way.

70. The improper acts and omissions of SALKOFF and EBERT's resulted in imminent jeopardy and a lack of preclusion. SALKOFF and EBERT made serious errors that forced the situation. SALKOFF and EBERT violated the Use of Force policies and did not follow their training. Therefore, SALKOFF and EBERT's actions did not comply with departmental policies, procedures, and training. SALKOFF and EBERT's conduct involved multiple serious deviations – not mere technical deviations – from policy, tactics, and training leading to the death of Guzman.

71. As a result of the foregoing, GUZMAN suffered intense physical and emotional pain, anguish, distress and despair, and pre-death pain and suffering, including the loss of enjoyment of life and loss of familial relations.

72. SALKOFF and EBERT and DOES 1-10, are responsible for the GUZMAN's injuries and death either because they were personally involved or because they were integral participants or because they failed to intervene.

III.

FIRST CLAIM FOR RELIEF

EXCESSIVE FORCE - (Nev. Cons. art. 1, § 18)

(SPECIAL ADMINISTRATORS v. SALKOFF and EBERT, DOES 1 and 2)

1 73. Plaintiffs repeat, reallege, and incorporates herein by this reference, each and every
2 allegation above as though fully set forth herein.

3 74. Article 1, section 18 of the Nevada Constitutions requires the degree of force used by
4 an officer to be objectively reasonable under the circumstances. Whether an officer's particular use
5 of force was reasonable is judged from the perspective of a reasonable officer at the scene.

6 75. To determine the perspective of a reasonable officer at the scene, a factfinder must
7 consider the totality of the circumstances, including, but not limited to, the nature of the crime or
8 other circumstances known to the officer, whether the plaintiff posed an immediate threat to the
9 officer or others, the relationship between the need to use force and the amount or degree of force
10 used, whether the officer made efforts to limit the amount of force used, and the availability of
11 alternative methods that police officers can utilize to accomplish legitimate law enforcement
12 objectives.

13 76. SALKOFF and EBERT shot at GUZMAN six (6) times and striking her with four (4)
14 bullets causing her death.

15 77. Despite knowledge of her possession of a knife, SALKOFF and EBERT failed to
16 preplan their course of action on how to deal with GUZMAN considering the circumstances.

17 78. SALKOFF and EBERT were clearly caught off guard when GUZMAN exited the
18 house. This is particularly troubling in light of the fact that they knew she had a knife, they knew she
19 had allegedly injured someone and that she was alone in the house. That is the result of the lack of
20 planning and communication which resulted in them being backed into a corner.

21 79. SALKOFF did not even remotely consider the possibility that GUZMAN might come
22 out with the knife, by how she positioned herself in the situation. She was in a position in which if
23 she had to fire her weapon, Neil would be in the line of fire.

24 80. SALKOFF and EBERT immediately drew their weapons at the sight of GUZMAN
25 with a knife in her hand and repeatedly screamed at her despite the fact that she was obviously in
26 crisis, paranoid, and unable to hear, comprehend or comply with commands.

27
28

1 81. Despite the many opportunities they had to create cover and maintain distance from
 2 GUZMAN, and despite the availability of less lethal options, SALKOFF and EBERT made the
 3 conscious decision to use deadly force.

4 82. The unjustified use of excessive force against GUZMAN by SALKOFF and EBERT,
 5 including, but not limited to, shooting GUZMAN four times – which proved fatal to GUZMAN –
 6 deprived GUZMAN of her right to be secure in her person against unreasonable and excessive force
 7 as guaranteed to GUZMAN pursuant to violated Article I, § 8 and Article 18 of the Nevada
 8 Constitution.

9 83. As a result of SALKOFF and EBERT's and DOE 1's and DOE 2's actions and
 10 omissions, as well as their failure to properly respond to the situation, utilize less lethal means, and
 11 utilize the other officers that were present for backup, GUZMAN was shot and killed.

12 84. The conduct of SALKOFF and EBERT was willful, wanton, malicious, and done with
 13 reckless disregard for the rights and safety of GUZMAN and therefore warrants the imposition of
 14 exemplary and punitive damages as to SALKOFF and EBERT.

15 85. The Co-Special Administrators of the Estate of GUZMAN also seek statutory
 16 attorney fees and costs under this claim.

17 IV.

18 SECOND CLAIM FOR RELIEF

19 **BATTERY – WRONGFUL DEATH (Nevada State Law Claim)**
 20 **(SPECIAL ADMINISTRATORS and CARILLO v. ALL DEFENDANTS)**

21 86. Plaintiffs repeat, reallege, and incorporate herein by this reference, each and every
 22 allegation above as though fully set forth herein.

23 87. SALKOFF and EBERT and DOES 1-10, while working as Police officers for
 24 NLVPD, and acting within the course and scope of their duties, used unreasonable force when they
 25 intentionally shot GUZMAN.

26 88. Defendants SALKOFF and EBERT intentionally shot GUZMAN multiple times, at
 27 close range, and used unwarranted excessive and deadly force. GUZMAN did not consent to be shot
 28 multiple times.

89. As a result of the actions of SALKOFF and EBERT, and DOES 1-10, GUZMAN suffered severe pain and suffering and ultimately died from her injuries and lost any potential earning capacity. SALKOFF and EBERT and DOES 1-10 had no legal justification for using said force, including deadly force, against GUZMAN, while carrying out their official duties.

90. As a direct and proximate result of the SALKOFF and EBERT's conduct as alleged above, GUZMAN died and has left her daughter, CAMARILLO, to suffer extreme and severe mental anguish and pain. CAMARILLO has been deprived of the life-long love, companionship, comfort, non-economic support, society, care, and sustenance of GUZMAN, and will continue to be so deprived of her natural life. CAMARILLO and Co-Special Administrators are also claiming funeral and burial expenses.

91. Defendant CNLV, by and through NLVPD, is vicariously liable for the wrongful acts of SALKOFF and EBERT and DOES 1-10 because they were acting under color of law and within the course and scope of their employment as police officers for NLVPD.

92. The conduct of SALKOFF and EBERT were malicious, wanton, oppressive, and accomplished with a conscious disregard for the rights of Plaintiffs and GUZMAN, entitling Plaintiffs to an award of exemplary and punitive damages against SALKOFF and EBERT.

93. Plaintiffs seek all permissible wrongful death damages under Nev. Rev. Stat. §41.085, including, but not limited to, damages for their grief, sorrow, loss of probable non-economic support, companionship, society, comfort and consortium, and damages for pain, suffering of GUZMAN, and any penalties, including, but not limited to, exemplary and punitive damages.

94. Plaintiffs also seek statutory attorney fees and costs under this claim.

THIRD CLAIM FOR RELIEF

NEGLIGENCE – WRONGFUL DEATH (Nevada State Law Claim)
(SPECIAL ADMINISTRATORS v. ALL DEFENDANTS)

95. Plaintiffs repeat, reallege, and incorporates herein by this reference, each and every allegation above as though fully set forth herein.

1 96. The actions and inactions of the Defendants were negligent and reckless, as described
2 below:

3 a. The failure to properly code the dispatch call as 433 (Stolen property), rather than a
4 413A (Person with a knife) based on the information from the 911 call.

5 b. The failure to dispatch an adequate number of officers to respond to the call in
6 violation of NLVPD policy and procedure;

7 c. The failure to preplan and coordinate their approach to the call, given the
8 circumstances;

9 d. The failure to move Neil to safety and to aggravate the situation by talking to Neil
10 where GUZMAN could see them;

11 e. The failure of SALKOFF and EBERT to utilize supporting officers who were already
12 at the scene to deal with a person with mental illness, contrary to CNLV's policies and procedures;

13 f. The failure to properly and adequately assess the need to use deadly force against
14 GUZMAN;

15 g. The failure of SALKOFF and EBERT to communicate with each other and DOES 1
16 and 2;

17 h. The failure of SALKOFF and EBERT to develop a rapport with GUZMAN or even
18 show any concern for her while she was inside the house;

19 i. The negligent tactics with GUZMAN, including the use of excessive force in shooting
20 of GUZMAN and pre-shooting negligence and the failure to allow GUZMAN time to comply with
21 their commands.

22 j. The failure to de-escalate the situation to prevent OIS;

23 k. The failure to use less intrusive means available;

24 l. The failure to use special caution when arrestee shows signs of mental instability;

25 m. The failure to provide adequate verbal warnings and commands and not providing
26 GUZMAN an opportunity to comply.

27 n. The failure to provide warnings before deadly force was used;

28 o. The negligent use of deadly force against GUZMAN;

- 1 p. The negligent failures to employ tactics;
 - 2 q. The failure to provide prompt medical care to GUZMAN;
 - 3 r. The failure to properly train and supervise employees, including SALKOFF and
 - 4 EBERT and DOES 1-10;
 - 5 s. The failure to ensure that adequate numbers of employees with appropriate education
 - 6 and training were available to meet the needs of and protect the rights of GUZMAN;
 - 7 t. The negligent handling of report writing, evidence and witnesses; For example, the
 - 8 time-line in the reports is internally inconsistent and metaphysically impossible.
 - 9 u. The failure to investigate into the conduct of SALKOFF and EBERT and DOES 1-10
 - 10 and the events relating to the shooting of GUZMAN and/or failure of NLVPD to conduct a prompt
 - 11 and thorough investigation into the actions/inactions of SALKOFF and EBERT and DOES 1-10;
 - 12 v. The failure to do anything or take any action with respect to the shooting of
 - 13 GUZMAN, resulting in de facto ratification;
 - 14 w. The failure to follow proper protocol in investigating this OIS and conducting
 - 15 thorough, unbiased interviews;
 - 16 x. Violating NLVPD's policy regarding the use of excessive force specifically that
 - 17 applies to individuals suffering from mental crises.
 - 18 y. Violating NLVPD's policy regarding the use of deadly force;
- 19 97. As a direct and proximate result of the Defendants' conduct as alleged above, and
20 other undiscovered negligent conduct, GUZMAN was caused to suffer severe pain and suffering and
21 ultimately died and lost earning capacity.
- 22 98. As a direct and proximate result of Defendants' conduct as alleged above, Plaintiffs
23 suffered extreme and severe mental anguish and pain and have been injured in mind and body.
24 CAMARILLO have been deprived of the life-long love, companionship, comfort, support, society,
25 care, and sustenance of GUZMAN and will continue to be so deprived for the remainder of her
26 natural life.
- 27 99. The CO-SPECIAL ADMINISTRATORS of DECEDENT's estate are also claiming,
28 *inter alia*, funeral, and burial expenses.

1 100. NLVPD is vicariously liable for the wrongful acts of SALKOFF and EBERT and
 2 DOES 1-20 because they acted under the color of law and within the course and scope of their
 3 employment as police officers for the NLVPD.

4 101. Upon information and belief, the negligent acts of SALKOFF and EBERT, and
 5 DOES 1-20, which resulted in bodily harm, including death to GUZMAN were vicariously
 6 condoned by NLVPD.

7 102. The individual Plaintiffs seek all permissible damages under Nev. Rev. Stat. §41.085,
 8 including, but not limited to, damages for their grief, sorrow, loss of probable support,
 9 companionship, society, comfort and consortium, and damages for pain, suffering of the GUZMAN,
 10 any penalties, including, but not limited to, exemplary and punitive damages.

11 103. CAMARILLO also seek statutory attorney fees and costs under this claim.
 12

VI.

FOURTH CLAIM FOR RELIEF AMERICANS WITH DISABILITIES ACT- 42 USC. § 12131 And REHABILITATION ACT 29 USC. § 794 (SPECIAL ADMINISTRATORS v. CNLV)

16 104. Plaintiffs repeat, reallege, and incorporates herein by this reference, each and every
 17 allegation above as though fully set forth herein.

18 105. Upon information and belief, CNLV by and through NLVPD, receives federal
 19 funding.

21 106. Upon information and belief, GUZMAN suffered from a mental disability.

22 107. Upon information and belief, CNLV by and through NLVPD, knew or should have
 23 known that GUZMAN suffered from mental disability based on her behavior.

24 108. CNLV by and through NLVPD, had an obligation under the Americans with
 25 Disabilities Act and the Rehabilitation Act (ADA) to accomodate GUZMAN's disability when
 26 attempting to effectuate her deten

1 109. Upon information and belief, CNLV by and through NLVPD, did not modify their
2 tactics to account for GUZMAN's disability and in doing so both failed to reasonably accommodate
3 her disability and discriminated against her based on her disability.

4 110. Upon information and belief, CNLV by and through NLVPD, does not instruct their
5 officers to modify their tactics to effectuate arrest that reasonably accommodates disabilities when
6 dealing with individuals with mental disabilities and by failing to do so discriminated against
7 GUZMAN based on her disability.

9 111. The ADA was enacted "to provide a clear and comprehensive national mandate for
10 the elimination of discrimination against individuals with disabilities" and "to provide clear, strong,
11 consistent, enforceable standards addressing discrimination against individuals with disabilities." 42
12 U.S.C. § 12101(b)(1) & (2).

13 112. Title II of the ADA provides: No qualified individual with a disability shall, by reason
14 of such disability, be excluded from participation in or be denied the benefits of the services,
15 programs, or activities of a public entity, or be subjected to discrimination by any such entity. *Id.* §
16 12132. Discrimination includes a failure to reasonably accommodate a person's disability. To be a
17 qualified individual with a disability, a person must suffer from a physical or mental impairment that
18 substantially limits that person's ability to perform a major life activity — an activity that the
19 average person in the general population can perform.

21 113. Title II of the ADA includes an affirmative obligation that public entities must make
22 accommodations for people with disabilities.

24 114. Title II of the ADA mandates a public entity may be liable for damages under Title II
25 of the ADA if it intentionally or with deliberate indifference fails to provide a reasonable
26 accommodation to a disabled person. The failure to provide reasonable accommodation constitutes
27 discrimination against the disabled person. A public entity may not disregard the plight and distress
28 of a disabled person by failing to accommodate his or her needs.

1 115. Title II of the ADA mandates that once an entity is on notice of the need for
2 accommodation, it is required to undertake a fact-specific investigation to determine what constitutes
3 a reasonable accommodation.

4 116. Title II of the ADA applies to CNLV by and through NLVPD, because it is a public
5 entity.

6 117. Title II of the ADA applies to police departments.

7 118. Title II of the ADA requires CNLV by and through NLVPD, to train its officers in
8 how to deal with physically and mentally disabled individuals.

9 119. Title II of the ADA mandates that government agencies, including police officers,
10 must take a disabled person's disability into account by making reasonable modifications of policies
11 and practices where needed to avoid discrimination. 42 U.S.C. Section 12132, 28 C.F.R. Section
12 35.130(b)(7).

13 120. GUZMAN's form of mental illness is a recognized impairment for purposes of the
14 ADA.

15 121. GUZMAN was disabled under the ADA because her mental illness substantially
16 limited her ability to communicate, to interact with others, and to care for himself.

17 122. CNLV by and through NLVPD, knew or should have known GUZMAN was
18 experiencing a severe mental health crisis. These Defendants should have known how to
19 accommodate her mental illness by employing de-escalation strategies with the intent of achieving a
20 safe and nonviolent self-surrender. Yet despite this knowledge, and the national mandate to
21 accommodate the disabled, these Defendants chose to not to accommodate GUZMAN impairment
22 and chose to apply tactics that made a safe and nonviolent self-surrender impossible.

23 123. CNLV by and through NLVPD, utilized techniques nationally understood to
24 exacerbate and intensify stress and apprehension in the mentally ill. Such practices have long been
25 rejected by police departments when interacting with persons suffering mental impairment. Such

1 practices render it impossible for mentally ill persons to understand and/or to comply with directives
2 and commands and are guaranteed to make a safe and peaceful self-surrender impossible.

3 124. CNLV by and through NLVPD, could have reasonably accommodated GUZMAN by
4 preplanning and coordinating with each other on how to approach, using nonlethal beanbag
5 measures, and using the passage of time to defuse the situation peacefully rather than encouraging an
6 deadly confrontation.

7 125. CNLV by and through NLVPD, had the time, safety and opportunity to assess the
8 situation and administer a strategy to appropriately accommodate GUZMAN because she was alone
9 inside the house, she maintained significant proximity from Defendants, and Defendants were
10 positioned for safe retreat.

12 126. At all times, CNLV by and through NLVPD, could have accommodated GUZMAN
13 by not aggravating the situation when they were hanging out in front of the house and chatting with
14 GUZMAN's roommate. Even when an emotionally disturbed individual is acting out and inviting
15 officers to use force to subdue him, the government interest in using such force is diminished by the
16 fact that the officers are confronted, not with a person who has committed a serious crime against
17 others, but with a mentally ill person who needs and requires accommodation for his disability.

19 127. At all times, CNLV by and through NLVPD, knew or should have known that
20 GUZMAN had a knife and that she was mentally distressed and because of her impairment, they
21 were required to exert greater effort and caution to take control of the situation through less intrusive
22 means.

24 128. By failing to accommodate GUZMAN's mental health disability, Defendants acted
25 with discriminatory intent and deliberate indifference to her protected rights.

26 129. The conduct alleged herein was done in reckless disregard of GUZMAN's protected
27 rights.

130. By reason of the aforementioned acts and omissions of Defendants and each of them, Plaintiff has suffered loss of love, companionship, affection, comfort, care, and society due to the death of GUZMAN.

131. Accordingly, Defendants and each of them are liable to Plaintiff for compensatory damages in an amount according to proof at trial.

132. Plaintiff also seeks statutory attorney fees under this claim.

133. CNLV by and through NLVPD, is vicariously liable to Plaintiff for damages for the foregoing acts of SALKOFF and EBERT and the emotional distress negligently inflicted upon Plaintiff because they were acting under color of law, employed by CNLV by and through NLVPD and within the course and scope of their employment as police officers for the NLVPD.

134. As a direct and proximate result of Defendants' conduct as alleged above, Plaintiff suffered extreme and severe mental, emotional anguish, distress, and pain for the death of her mother.

135. Plaintiff is therefore entitled to damages for her mental and/or emotional distress as a result of the conduct of SALKOFF and EBERT above mentioned.

136. Plaintiff also seeks attorney's fees and costs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, ANGELINA CAMARILLO, Individually and as Co-Special Administrator with ROLLY ENRIQUEZ of the estate of FELICIA GUZMAN, through their attorney, request entry of judgment in their favor and against Defendants as follows:

- A. For compensatory damages, including both survival damages and wrongful death damages under state law, in an amount to be proven at trial;
 - B. For general and hedonic damages;
 - C. For funeral and burial expenses;
 - D. For medical billing and expense;

- E. For punitive damages against SALKOFF and EBERT in an amount to be proven in trial;
 - F. For interest;
 - G. For reasonable costs of this action, court costs, and attorneys' fees; and
 - H. For such other and further relief as the Court may deem just, proper, and appropriate.

DATED: May 15, 2025

PETER GOLDSTEIN LAW CORP

By: /s/ Peter Goldstein
PETER GOLDSTEIN, ESQ.
Attorney for Plaintiffs
ANGELINA CAMARILLO, Individually
and as Co-Special Administrator with ROLLY
ENRIQUEZ of estate of FELICIA GUZMAN

DEMAND FOR JURY TRIAL

Plaintiffs, by and through their attorneys of record, hereby demand a jury trial of all of the issues in the above matter.

DATED: May 15, 2025

PETER GOLDSTEIN LAW CORP

By: /s/ Peter Goldstein
PETER GOLDSTEIN, ESQ.
Attorney for Plaintiffs
ANGELINA CAMARILLO, Individually
and as Co-Special Administrator with ROLLY
ENRIQUEZ of estate of FELICIA GUZMAN

EXHIBIT A

CERTIFICATION OF VITAL RECORD

DEPARTMENT OF HEALTH AND HUMAN SERVICES
DIVISION OF PUBLIC AND BEHAVIORAL HEALTH
VITAL STATISTICS

CASE FILE NO. 4350151

CERTIFICATE OF DEATH

2023011612

STATE FILE NUMBER

TYPE OR
PRINT IN
PERMANENT
BLACK INK

DECEDENT

IF DEATH
OCCURRED IN
INSTITUTION SEE
HANDBOOK
REGARDING
COMPLETION OF
RESIDENCE
ITEMS

PARENTS

DISPOSITION

TRADE CALL

CERTIFIER

REGISTRAR

CAUSE OF
DEATHCONDITIONS IF
ANY WHICH
GAVE RISE TO
IMMEDIATE
CAUSE
STATING THE
UNDERLYING
CAUSE LAST

1a. DECEASED-NAME (FIRST,MIDDLE,LAST,SUFFIX) Felicia Rena GUZMAN		2. DATE OF DEATH (Mo/Day/Year) May 16, 2023		3a. COUNTY OF DEATH Clark	
3b. CITY, TOWN, OR LOCATION OF DEATH Las Vegas		3c. HOSPITAL OR OTHER INSTITUTION-Name(if not either, give street and number) University Medical Center		3e. If Hosp. or Inst. indicate DOA,OP/Emer. Rm. Inpatient(Specify) Operating Room	
5. RACE (Specify) White		6. Hispanic Origin? Specify Yes - Mexican		7a. AGE-Last birthday 43	7b. UNDER 1 YEAR MOS DAYS
7c. UNDER 1 DAY HOURS MINS		8. DATE OF BIRTH (Mo/Day/Yr) February 15, 1980			
9a. STATE OF BIRTH (If not US/CA, name country) California		9b. CITIZEN OF WHAT COUNTRY United States		10. EDUCATION 14	
11. MARITAL STATUS (Specify) Never Married		12. SURVIVING SPOUSE'S NAME (Last name prior to first marriage)			
13. SOCIAL SECURITY NUMBER [REDACTED]		14a. USUAL OCCUPATION (Give Kind of Work Done During Most of OFFICE CLERK		14b. KIND OF BUSINESS OR INDUSTRY MEDICAL	
15a. RESIDENCE - STATE Nevada		15b. COUNTY Clark		15c. CITY, TOWN OR LOCATION Las Vegas	
15d. STREET AND NUMBER 555 Green Gables Avenue		15e. INSIDE CITY LIMITS (Specify Yes or No) Yes			
16. FATHER/PARENT - NAME (First Middle Last Suffix) Ricardo J GUZMAN			17. MOTHER/PARENT - NAME (First Middle Last Suffix) Consuelo Linda RENTERIA		
18a. INFORMANT- NAME (Type or Print) Consuelo Linda GUZMAN			18b. MAILING ADDRESS (Street or R.F.D. No, City or Town, State, Zip) 3536 Faberge Way Sacramento, California 95826		
19a. BURIAL, CREMATION, REMOVAL, OTHER (Specify) Cremation			19b. CEMETERY OR CREMATORIAL NAME Paradise Valley Crematory		
19c. LOCATION City or Town State Las Vegas Nevada 89119					
20a. FUNERAL DIRECTOR - SIGNATURE (Or Person Acting as Such) BILLY C VALLIE Jr SIGNATURE AUTHENTICATED			20b. FUNERAL DIRECTOR LICENSE NUMBER FD918		
20c. NAME AND ADDRESS OF FACILITY Davis Funeral Home and Memorial Park 6200 S Eastern Las Vegas NV 89119					
TRADE CALL - NAME AND ADDRESS					
21a. To the best of my knowledge, death occurred at the time, date and place and due to the cause(s) stated.(Signature & Title) To Be Completed by CERTIFYING PHYSICIAN			22a. On the basis of examination and/or investigation, in my opinion, death occurred at the time, date and place and due to the cause(s) stated. (Signature & Title) STEPHANIE YAGI DO SIGNATURE AUTHENTICATED		
21b. DATE SIGNED (Mo/Day/Yr) May 26, 2023			22c. HOUR OF DEATH 18:59		
21d. NAME OF ATTENDING PHYSICIAN IF OTHER THAN CERTIFIER (Type or Print) [REDACTED]			22d. PRONOUNCED DEAD (Mo/Day/Yr) May 16, 2023		
22e. PRONOUNCED DEAD AT (Hour) 18:59					
23a. NAME AND ADDRESS OF CERTIFIER (PHYSICIAN, ATTENDING PHYSICIAN, MEDICAL EXAMINER, OR CORONER) (Type or Print) Stephanie Yagi DO 1704 Pinto Lane Las Vegas, NV 89106			23b. LICENSE NUMBER DO3172		
24a. REGISTRAR (Signature) NANCY BARRY SIGNATURE AUTHENTICATED			24b. DATE RECEIVED BY REGISTRAR (Mo/Day/Yr) May 26, 2023		
24c. DEATH DUE TO COMMUNICABLE DISEASE YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>					
25. IMMEDIATE CAUSE (ENTER ONLY ONE CAUSE PER LINE FOR (a), (b), AND (c).) PART I Multiple Gunshot Wounds					
Interval between onset and death					
DUE TO, OR AS A CONSEQUENCE OF:					
Interval between onset and death					
(b) DUE TO, OR AS A CONSEQUENCE OF:					
Interval between onset and death					
(c) DUE TO, OR AS A CONSEQUENCE OF:					
Interval between onset and death					
(d)					
PART II OTHER SIGNIFICANT CONDITIONS-Conditions contributing to death but not resulting in the underlying cause given in Part I.					
28a. ACC., SUICIDE, HOM., UNDET. OR PENDING INVEST. (Specify) Homicide			26. AUTOPSY (Specify Yes or No) Yes		
28b. DATE OF INJURY (Mo/Day/Yr) May 16, 2023			27. WAS CASE REFERRED TO CORONER (Specify Yes or No) Yes		
28c. HOUR OF INJURY 1633			28d. DESCRIBE HOW INJURY OCCURRED Shot By Other(s)		
28e. INJURY AT WORK (Specify Yes or No) No			28f. PLACE OF INJURY- At home, farm, street, factory, office building, etc. (Specify) Outdoors/Non-Public		
28g. LOCATION STREET OR R.F.D. No. 1414 Basin Brook Drive			28h. CITY OR TOWN STATE North Las Vegas Nevada		

"CERTIFIED TO BE A TRUE AND CORRECT COPY OF THE DOCUMENT ON FILE WITH THE REGISTRAR OF VITAL STATISTICS, STATE OF NEVADA." This copy was issued by the Southern Nevada Health District from State certified documents authorized by the State Board of Health pursuant to NRS 440.175.

DATE ISSUED: 6/1/2023

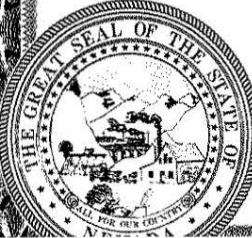
This Copy not valid unless prepared on engraved border displaying date, seal and signature of Registrar.
SOUTHERN NEVADA HEALTH DISTRICT • P.O. Box 3902 • Las Vegas, NV 89127 • 702-759-1010 • Tax ID # 88-0151573Registrar of Vital Statistics **SIGNATURE AUTHENTICATED**By: *Susan Zannis*

EXHIBIT B

Howard S. Lewis
CLERK OF THE COURT

OASA
Peter Goldstein, Esq., (SBN 6992)
PETER GOLDSTEIN LAW CORP
10161 Park Run Drive, Suite 150
Las Vegas Nevada, 89145
Telephone: 702-474-6400
Facsimile: 888-400-8799
peter@petergoldsteinlaw.com

*Attorney for Petitioner,
ANGELINA CAMARILLO and ROLLY ENRIQUEZ*

JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

**In the Matter of the Estate of
FELICIA RENA GUZMAN**

P-24-121635-E Consolidated with
Case No.: P-25-125120-E
Dept. 26

Deceased,

~~PROPOSED ORDER~~

**ORDER APPOINTING SPECIAL ADMINISTRATOR AND FOR ISSUANCE OF
SPECIAL LETTERS OF ADMINISTRATION**

Upon submission of a verified *ex parte* petition for appointment of a special administrator and for issuance of special letters of administration representing as follows:

Felicia Rena Guzman (“Decedent”) died intestate on May 16, 2023 in Clark County, Nevada.

1. Decedent was a resident of Clark County, Nevada when she died.
 2. Petitioners have never been convicted of a felony.

NOW THEREFORE IT IS HEREBY ORDERED that Petitioners Angelina Camarillo and Rolly Enriquez are appointed as Special Co-Administrators of the Estate of Felicia Rena Guzman and that Special Letters of Administration be issued, without bond, to Petitioners Angelina Camarillo upon taking the oath of office, for the purpose of administering the estate in

1 accordance with Nevada Revised Statutes Chapter §140.040.

2 **IT IS FURTHER ORDERED** that all moneys received by this Estate will be placed in
3 the attorney's trust account until further ordered by the Court.

4 **IT IS FURTHER ORDERED** that the settlement of the Decedent's lawsuit is subject to
5 this Court's approval.

6
7 Dated this ____ day of ____, 2025.

Dated this 14th day of May, 2025



C5F 4B4 82D9 7C41
Gloria Sturman
District Court Judge

10
11 District Court Judge

12 Respectfully submitted,

13 By: 

14 PETER GOLDSTEIN, ESQ. [SBN 6992]
15 10161 Park Run Drive, Suite 150
16 Las Vegas, Nevada 89145
17 *Attorney for Petitioners*
18 *Angelina Camarillo and Rolly Enriquez*

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